

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ELODIE PARONI, Individually and on Behalf
of the Estate of EUGENE PARONI

Plaintiff

vs.

ALSTOM SA, INDIVIDUALLY AND
AS PARENT, ALTER EGO AND/OR
SUCCESSOR-IN-INTEREST TO ALSTOM
POWER UK LTD., ALSTOM POWER, INC.,
ABB ALSTOM POWER INDUSTRIAL
TURBINES LTD., ABB ALSTOM POWER
INDUSTRIAL TURBINES, INC., ALSTOM GAS
TURBINES LTD., ALSTOM GAS TURBINES,
INC., EUROPEAN GAS TURBINES LTD.,
EUROPEAN GAS TURBINES, INC., RUSTON
GAS TURBINES, LTD., AND/OR RUSTON
GAS TURBINES, INC.;

Defendant

Civil Action No.: 1-19-cv-01034-PAE

**PLAINTIFF'S UNOPPOSED
MOTION FOR LEAVE TO
FILE THIRD AMENDED
COMPLAINT**

Pursuant to Rule 15 of the Federal Rules of Civil Procedure, Plaintiff Elodie Paroni, respectfully moves this Court for leave to file the attached Third Amended Complaint (attached hereto as **Exhibit A**). Counsel for Defendant Alstom SA has identified another entity, General Electric UK Holdings Ltd, as the correct party. The proposed Third Amended Complaint, proposes to substitute Defendant Alstom SA with the proper Defendant General Electric UK Holdings Ltd.

Rule 15 provides that “a party may amend its pleading with the opposing party’s written consent or the court’s leave” and that “[t]he court should freely give leave when justice so

requires.” Fed. R. Civ. P. 15(a)(2). Plaintiff has written consent of Defendant to file the Third Amended Complaint. General Electric UK Holdings Ltd. will be represented by the same counsel representing Alstom SA and has agreed to accept service on behalf of the company to avoid further delays via service through the Hague Convention. Additionally, General Electric UK Holdings Ltd. will not raise a statute of limitations defense.

For these reasons, Plaintiff respectfully requests this Court grant her leave to file the attached Third Amended Complaint.

Respectfully submitted,

By: /s/ Angela J. Nehmens

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Admitted Pro Hac Vice

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Attorneys for Plaintiff

Granted.

SO ORDERED.

9/15/20


PAUL A. ENGELMAYER
United States District Judge

September 15, 2020